



**HON. SYLVIA O. HINDS-RADIX**  
*Corporation Counsel*

**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**Alan H. Scheiner**  
Senior Counsel  
Desk: 212-356-2344  
[ascheine@law.nyc.gov](mailto:ascheine@law.nyc.gov)

June 16, 2023

**BY ECF**

Honorable Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: *Nunez, et al. v. City of New York et al*, 11-cv-5845 (LTS)

Dear Chief Judge Swain:

I am a Senior Counsel in the Office of the Corporation Counsel of the City Of New York, Hon. Sylvia O. Hinds-Radix, assigned to represent the defendants the City of New York (“City”) and the New York City Department of Correction (“DOC” or “the Department”) in this matter.

I write with respect to this Court’s Order of March 13, 2023 (ECF No. 511), requiring defendants to provide an update today regarding the “status of their continued efforts to implement reliable Intake tracking systems for new admissions and inter/intra facility transfers.”

The City must respectfully request an extension of time to submit an updated status report, from June 16, 2023 to June 21, 2023. We apologize for the lateness of this request, and regret any inconvenience to the Court, the Monitor and the parties. The City expected to be able to file the report today, but due to unexpected developments, including Department personnel being away from the office, it has become impossible to complete the report in a satisfactory manner. The City is mindful of the Court’s need for complete and accurate information, and in light of this, the defendants respectfully request a two business day extension for the Law Department to ensure that the report is complete and accurate to the best of our abilities.

As Monday is holiday, defendants respectfully request to be permitted to file their status report regarding intake matters on Wednesday June 21, 2023.

We thank the Court for its consideration of this matter.

Sincerely,

Alan H. Scheiner /s/

Alan H. Scheiner  
Senior Counsel  
Special Federal Litigation Division

cc: BY ECF (w/encl.)  
*All counsel of record*

The foregoing request is granted. DE no. 552 resolved.

SO ORDERED.

6/20/2023

/s/ Laura Taylor Swain, Chief USDJ